January 13, 1992

CONFIDENTIAL

FINLAND COMMUNICATIONS PLAN

The Aho communications plan comprises three tiers:

TIER I: Finland

TIER II: Key Nations (European Community Nations, Australia/New Zealand, U.S.A.)

TIER III: International Locations

This document is divided into the following sections:

TAB 1: Tier I Operations

TAB 2: Tier II Operations

TAB 3: Tier III Operations

TAB 4: Messages

- Finland
- Finland Statements
- International

TAB 5: Implementation All Tiers

WORKING DRAFT

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Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

Tier I Finland

1. Decision Alert

As soon as the decision is announced by the court, a designated on-site court house monitor equipped with a cellular telephone will call in the result to the PR Situation Room. The decision will be communicated to staff in the Situation Room who will then call designated individuals and relay the news.

The on-site staff member with the above responsibility will then join the "huddle" of PR staff and attorneys as they decide what messages will be delivered to media. This information will then be called in to the PR Situation Room for distribution by phone to the designated parties.

2. Courthouse Steps Interviews

(A) After the decision is announced, defense attorneys and other designated members of the legal team along with designated PR staff will meet in a corner of the courtroom to decide upon the appropriate messages for media. To the extent possible, these messages will be derived from preliminary draft statements and the media training scheduled for January 30, 31.

(B) If print reporters are allowed in the courtroom but TV cameras are not, we will provide print media with spokespeople at a designated area in another suitable location near the courtroom. Print reporters will be notified of the availability of spokespeople via a media alert and by PR staff on-site prior to and after the verdict is announced.

If events become a "circus" outside the courthouse, reporters and spokespeople will go outside the courthouse. The spokespeople will split up so that each can handle a portion of the questions.

(C) After messages have been finalized by the "huddle" team, a designated PR staff member will lead spokespeople to the prearranged location inside the courthouse to meet the print press. Each spokesperson will handle his own group of reporters to maximize accessibility. These interviews will last no more than 15 to 20 minutes.

(D) If TV camera are allowed in the courtroom, PR staff will do its best to encourage broadcast

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media to move outside the courthouse to predesignated locations and await the spokespeople. This is designed to accommodate print media's deadlines and provide TV with more space to work with spokespeople.

(E) After the 15 to 20 minute print interviews are completed, PR staff will inform reporters that the spokespeople are moving outside to accommodate TV news and then lead spokespersons to their designated spots outside the courtroom where they will meet the cameras. Print and radio reporters will undoubtedly follow to continue to ask questions, so spokespeople and PR staff must attempt to give priority to TV. Again each spokesperson will deal with individual groups of reporters. The spokespeople will be separate and will not provide comments to the same group of media at the same time.

(F) After 15 to 20 minutes of interviews on the courthouse steps, PR staff will call a halt to the questioning, remind reporters of the follow-up press conference and lead the spokespeople to cars waiting at the scene to take them back to the law firm's Situation Room for analysis of the opinion.

(G) NO COMPANY OFFICIALS OR REPRESENTATIVES EXCEPT FOR LEGAL AND PR TEAMS WILL BE PRESENT AT THE COURTHOUSE.

3. Companies' Statement

The on-site PR operative assigned to call in the verdict and, later, the messages, will also have the responsibility for writing the final press statement. After participating in the courtroom "huddle" and calling in the messages, the PR operative will immediately return to the law firm's Situation Room and write a draft press statement. This draft will be further adjusted after the analysis of the opinion is completed. Once this statement is approved, it will be faxed to the PR Situation Room for retyping, copying and distribution to the news services, to media not attending the press conference and media that call in for interviews.

4. Opinion Analysis

(A) Attorneys analyzing the opinion must understand that the primary objective at this particular juncture will be to prepare for the press conference which will be scheduled for 3:00 or 3:30 PM the same day (final time to be determined later). Time must be allotted for getting the

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spokespeople to the press conference site and for message development based on the opinion analysis to augment positions used at the courthouse steps. Specific passages from the opinion should be inserted into the statement and messages if appropriate.

(B) As soon as a copy of the opinion arrives at the law office Situation Room, copies for those who need it must be made. Several copiers in particular must be made available to PR or clerical staff so they can made copies for faxing to predesignated recipients around the world.

(C) The companies' statement, now in its final version, must be approved at this time for use by PR staff with media. Also distributed to interested industry parties.

(D) Opening statements for Stoy and Rettig, to be used to open the press conference, must also be written and approved at this time.

(E) Once all above activities are completed, spokespeople and PR staff will be taken by cars waiting on the street at the law office, to the press conference site.

5. Press Conference

(A) The press conference room will be manned at least 1.5 hours before the start of the press conference by two PR operatives. These operatives will be responsible for working with hotel staffers to make sure all arrangements are complete. This includes table, table cloth, water, glasses, chairs, microphones(s), PA, podium (if necessary), audience seating, electrical power needs, platforms (if available) for TV cameras, sign-in table blocking entrance, sign-in books, etc.

(B) Upon arriving at the press conference site, spokespeople would be kept away from the media until just before the press conference begins. Use "holding room" for this purpose. A senior PR staff on-site will make that determination and alert spokespeople who will proceed to the front of the room and sit down. The PR staffer will call the press conference to order, explain what the press conference is for, introduce the spokespeople and explain that they, or one, will read an opening statement before taking questions. One or both spokespeople will read their/the statement and then field questions.

Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

(C) Company officials should not be present at the press conference. All reporters must sign-in with their name and affiliation. Press conference should last from 20 - 45 minutes based on the situation. Adequate time must be allowed for the spokespeople to travel to the PR Situation Room and call back reporters for phone interviews. Senior PR staffer will call an end to the press conference at the appropriate time.

6. Phone Interviews

(A) We expect to receive media calls by phone through the day as a result of the media alert we will send out early Feb. 6 and early reports of the decision. Directions will also be given that all calls to Stoy and Rettig, NMA and Amer be referred to the PR Situation Room. All incoming calls will be logged and prioritized for call backs. Callers who phone in prior to the decision will be told that spokespeople will be available at the courthouse and the press conference. Callers who phone in after the verdict will be told of the press conference and arrangements for call backs for interviews. The written statement will be offered to all and will be distributed when approved. The statement is not intended to replace an interview unless PR staff determines a particular outlet does not require an interview for priority reasons, lack of time, etc.

(B) Once the spokespeople arrive at the PR Situation Room from the press conference, each will be handed a number of "call sheets." Each call sheet will have the name of the reporter, his/her affiliation, time of call, deadline, questions he/she wants to ask. The spokesperson will then return these calls one by one and in order from two telephone lines dedicated to outgoing calls only. If a reporter is not available, the spokesperson will leave the phone number to one of the incoming lines. Each spokesperson will be provided a short instructional page for returning calls.

7. Follow-up Media

(A) The same spokespeople should be available to answer media inquiries and/or appear on TV/radio talk shows during the days immediately following the verdict. Again, these calls would be directed to a single source who would coordinate interview requests.

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(We must determine how long these spokespeople will be willing to deal with the media on this subject. If necessary, alternative spokespeople from Amer should be prepared to fill this role.)

(B) Print op-ed articles with appropriate bylines should be prepared in advance. After appropriate changes are made and approved, the op-eds should be offered to key print media outlets and key legal journals.

(C) Conduct survey, sponsored by local newspaper, if appropriate, on subject of freedom of choice and personal responsibility.

8. NMA and Amer

NMA and Amer, when asked by media for their own views of the decision, should provide short, specific comments, verbally and if necessary on paper, and then refer inquiries to the PR Situation Room for response by spokespeople.

9. Employee Communications

Each company, organization will draft an employee statement based on messages developed for media. These statements should be distributed to employees as soon as possible after the verdict.

10. International Satellite Coverage

(A) We will have our own camera crews on-site at the courthouse and at the press conference taping our spokespeople at both events. After the press conference, the camera crew will go immediately to their studio to edit soundbites for inclusion with international feeds. A senior PR operative and/or attorney must approve.

(B) We will also send up prepared B-roll footage that provides context for the verdict.

11. Radio Actualities

A radio feed (cassette distribution) will be carried out on the day of the verdict. The contents of the radio feed will be prepared in advance covering all scenarios.

Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

TIER II EUROPEAN NATIONS, AUSTRALIA/NEW ZEALAND/HONG KONG, USA

1. The world in general will have access to our spokespeople through:

   (A) Foreign journalists and wire services based in Helsinki;

   (B) International satellite feeds emanating from Finland and

   (C) Phone calls to the PR Situation Rooms in Helsinki.

2. The United States, European Community Nations and Australia/New Zealand will also have the following:

   (A) Local spokespeople based in New York (USA), London (European Community Nations), and Sydney or Melbourne (Australia/New Zealand).

   (B) Each team of spokespeople will be made available via satellite (for broadcast) and telephone (print/radio) in their respective nations or geographic regions.

   For example, Chuck Wall of PM and Victor Schwartz would be available to handle U.S. media and PM/HQ in New York.

   (C) Spokespeople for these assignments must be identified and confirmed then briefed and trained. Currently considering Phil Francis and Greg Eggleton of Clayton Utz for Australia/New Zealand and Don Harris and Roger Whidden for Asia. No one yet identified for London/European Community Nations.

3. The same B-roll footage but with local sound bites will be available for use in each of these countries/geographic areas and will be part of the local satellite feed.

4. In the case of a loss, we will send up B-roll and media alerts for satellite interviews with above PM spokesperople.

5. In the case of a win, we will be in a position to be pro-active as well since all equipment and satellite time will already be secured and in place in case of a negative outcome. We need to arrive at a decision as to how pro-active we want to be in a win.

Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

TIER III PHILIP MORRIS

1. PM investor relations/financial must be briefed so they can communicate with analyst community.

2. About mid-January, PMI from Ryebrook, will send an "Issues Alert" to all offices with basic background information on the following:

   (A) The Aho Case, the principal players, key dates, claims, PM's non-role in the case, timetables of events

   (B) Instructions on how to handle media inquiries

   (C) Short precis on differences in legal systems

   (D) Short backgrounder on history of tobacco litigation pointing to industry track record, U.S. phenomenon

3. On February 6, all PMI offices will received approved short statements for media calls, plus a reiteration of all instructions.

Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

MESSAGES -- FINLAND

WIN: Common sense verdict

- Reinforces view that manufacturers cannot be held liable for risks associated with a product that consumers of that product are aware of.
- Freedom of choice, personal responsibility.
- Aurejarvi's misuse of judicial system to promote personal, social views/agenda.

LOSE: Verdict will be overturned on appeal

- Industry has never paid any plaintiffs any damages.
- Freedom of choice, personal responsibility.
- Aho exposed to other occupational risks.

(Note: Specific statements on the decision will be issued on Feb. 6, 1992.)

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Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

Messages -- European Community Nations, Australia/New Zealand/Hong Kong, USA, and Philip Morris offices

WIN: Verdict is in keeping with previous verdicts involving tobacco and health litigation where not a single plaintiff has been paid damages.

- Concept of freedom of choice, personal responsibility prevails.

LOSS: Verdict will be appealed.

- No damages ever paid by industry in the long history of tobacco and health litigation.
- Freedom of choice and personal responsibility.
- Has no impact locally because of differences in judicial system.

Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

Implementation -- General

- o Determine staffing needs, make assignments
- o Make provisions for team meetings to go over all assignments
- o Write short backgrounder on Aho case
- o Write short backgrounder on history of litigation in general
- o Establish all approval processes

Implementation -- Finland (General)

- o Determine and confirm law firm and PR Situation Rooms
- o Assemble appropriate equipment for Situation Rooms
  - Copy machines
  - Incoming/outgoing fax machines
  - Incoming/outgoing telephone lines
  - Word processors, printers
  - Clerical staff, assignments
  - Stationery, incidentals
- o Establish local approval process
- o Determine cellular phone needs, get equipment
- o Determination transportation needs, reserve
- o Determine best transportation routes
- o Collect all pertinent telephone, fax numbers
- o Media Training, January 30, 31
  - o ID trainees
  - o Create program
  - o ID staff

Implementation -- Tier I Finland

1. Decision Alert

Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

- Designate on-site operative and assign to call in verdict via cellular phone, then call in messages to PR Situation Room, write statement
- Designate person in PR Situation Room to receive verdict, messages calls.
- Determine personnal for communicating verdict and messages to those who need to know worldwide
- Assemble names, phone numbers, fax numbers of those who should be alerted to verdict, messages; alert in advance re: communication procedures, timing
- Determine who, how for communications to PM International

2. Courthouse Steps Interviews

- Prepare and brief foreign journalists in advance
- Prepare media alert; determine timing and logistics for release (prior to verdict at courthouse)
- Designate area in courtroom for "huddle"
- Determine who participates
- Designate area for courthouse interviews and print
- Designate area for courthouse steps interviews with TV
- Determine PR staff needs, ID personnel and make assignments
- Establish on-site approvals process

3. Companies' Statement

- Make sure writer has all necessary equipment
- Establish process for opinion analysis to impart their findings to writer
- Determine what parts of opinion can be used in future statement and ongoing messages
- Establish approval process
- Determine in advance who should receive statement; research and list in advance; identify operatives and means for distribution

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Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

4. Opinion Analysis

- Ensure that sufficient copies and copying machines are available to produce needed number of copies
- Determine in advance who is to get copies of opinion; list names, fax machines and telephone numbers
- Provide for sufficient equipment needs (adequate number of fax machines)

5. Press Conferences

- Determine location, book room
- Determine and order room accessories (tables, sign-in books, camera platforms, electrical supplies, etc.)
- Determine staffing needs; ID personnel and assign tasks
- Determine who will host press conference; script intro
- Designate writer for spokespeople opening remarks

6. Phone Interviews

- Determine staffing needs, ID operatives, make assignments, provide instructions, direction
- Designate incoming, outgoing telephone lines
- Design, produce "Call Sheets"
- Establish and provide referral procedures for Stoy, Rettig
- Instruct switchboards and operators
- Establish "media contact"
- Determine incoming, outgoing fax machine needs; requisition equipment
- Determine who prioritizes calls.
- Provide call back instructions to spokespeople

7. Follow-up Media

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Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

- o Ensure that Stoy, Rettig, NMA, Amer know to refer follow-up media requests to PR Situation Room or specific PR contact or agency

- o Draft Op-eds, determine by-lines; secure approval for early and immediate placement efforts; determine target placements who is to do it

- o Determine timing, procedures for "free choice/personal responsibility" poll and publicity

- o Determine spokesperson roles for Amer, NMA if appropriate and necessary

8. NMA and Amer

- o Draft statements for NMA and Amer; determine who delivers

- o Establish and provide referral procedures

- o Determine who will handle media calls

- o Provide written direction

- o Determine who receives calls from media at these locations

- o Determine what, if anything, Amer needs to provide financial community; decide who, how to handle

9. Employee Communications

- o Designate operatives to handle this assignment within each company, organization

- o Coordinate writing, distribution

10. International Satellite Coverage

- o Gain approval for B-roll; determine elements and produce

- o Review logistics with R. Frisch

  - Courthouse and press conference camera crews
  - Editing, production facilities
  - Transportation needs
  - Distribution points in and outside Finland
  - Telephone numbers, fax numbers, personnel, locations

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Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

11. **Radio Feed**

- Designate operative to oversee, supervise
- Determine logistics

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Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

TIER II European Community Nations, Australia/New Zealand/Hong Kong, USA

Note: The objective of the international communications preparations should not be to create publicity and focus on the case internationally but to have the full readiness to meet any attempts of the opposition to distribute biased and incorrect information on the case and the outcome worldwide. No coverage is good coverage; however, there's good reason to believe that especially in a "loss" situation the opposition is well prepared to distribute the news internationally with their own twist on the tale.

- o ID spokespeople for each area
  - USA: Chuck Wall, Victor Schwartz
  - European Community Nations: To be determined
  - Australia/New Zealand: To be determined (Greg Eggleston of Clayton Utz, Phil Francis)
  - Hong Kong: Don Harris, Roger Whidden (?)
- o Provide media training or briefing/rehearsal
- o Provide directions, logistics for all spokespeople
- o Establish communications, system for final briefing at time of verdict
- o Establish broadcast facility, satellite needs; book

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Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000

Tier III Philip Morris

- o Prepare backgrounders
  - Aho Case
  - Litigation history
- o Prepare instructions on media inquirers
- o Prepare preliminary statements
- o Prepare/provide precis on differences in judicial system
- o ID spokespeople
- o Meet with PM investor relations/financial for briefing
- o Coordinate with TI and other international industry associations
- o Coordinate activities with other members of industry
- o Alert all international and U.S. offices re: media call referrals in U.S.; determine which calls should be directed to PM Companies spokespersons

Source: https://www.industrydocuments.ucsf.edu/docs/zswk0000